REMARKS/ARGUMENTS

This Amendment is being filed in response to the Office Action dated September 19, 2005. Reconsideration and allowance of the application in view of the amendments made above and the remarks to follow are respectfully requested.

Claims 1-25 were pending in this application. Claim 1 is cancelled by this amendment without prejudice.

In the Office Action, Claims 1-19, 22-24 are rejected under 35 U.S.C. §101 as allegedly being directed to non-statutory subject matter.

Applicants respectfully disagree with and explicitly traverses this ground for rejecting Claims 1-19, 22-24. It is the Applicants' position that the claims require statutory subject matter. However, in the interest of furthering the prosecution of this matter, Applicants have elected to amend the claims to more clearly state the invention. Specifically, Applicants have amended the claims that return a result (e.g., generating the hash signal ...). No new matter is added by this amendment. Clearly Claims 1-19, 22-24 require statutory subject matter. Accordingly, it is respectfully requested that the amendment to the claims be entered

and that the rejection of Claims 1-19, 22-24 under 35 U.S.C. §101 be withdrawn.

It is respectfully submitted that the claims were not amended in order to address issues of patentability and Applicants respectfully reserve all rights they may have under the Doctrine of Equivalents. Applicants furthermore reserve their right to reintroduce subject matter deleted herein at a later time during the prosecution of this application or continuing applications.

FIGs. 1 and 4 are objected to for failing to functionally label each block element. A copy of replacement sheets including FIGs. 1 and 4 are submitted herein for the Examiner's approval. It is respectfully submitted that the drawings are now in proper form and a notice to that effect is respectfully requested. Formal drawings will be submitted after receipt of a Notice of Allowance.

Claims 1-2 and 9-13 are rejected under 35 U.S.C. §102(b) as allegedly anticipated by article by Schneider ("Schneider"). Claim 24 is rejected under 35 U.S.C. §102(b) as allegedly unpatentable over U.S. Patent No. 5,019,899 to Boles ("Boles"). Claims 3-8 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Schneider in view of ISO/IEC specification ("the ISO/IEC

Specification"). Claims 14-21 and 23 are rejected under 35 U.S.C.

§103(a) as allegedly unpatentable over Schneider in view of Boles.

Claim 25 is rejected under 35 U.S.C. §103(a) as allegedly

unpatentable over Boles. Claim 22 is rejected under 35 U.S.C.

§103(a) as allegedly unpatentable over Boles in view of U.S. Patent

No. 6,654,735 to Eichstaedt ("Eichstaedt").

Schneider shows a system for generating a hash signal to

verify the authenticity of an information signal. To that end,

Schneider shows generating a first level hash value for every frame

of an information signal, and then generating a second level hash

that is generated from all first level hashes (e.g., see,

Schneider, Figure 8). In rejecting Claim 2, the Office Action

cites sections of Schneider that refer to authenticating content

and not to generating the hash value (see, Schneider, page 228,

Column 2, and Figure 3 entitled, "Verifying a Content Based

Signature").

Accordingly, the method of Claim 2 is not anticipated or made

obvious by the teachings of Schneider. For example, Schneider does

disclose or suggest, a method that amongst other patentable

elements, comprises (illustrative emphasis provided) "generating

the hash signal as a string of successive hash words, wherein said computing step comprises the steps of: - dividing each frame of the information signal into one of bands or blocks; - calculating a property of the signal in each of said bands or blocks; - <u>comparing the properties in the bands or blocks with respective thresholds</u>; - <u>generating respective bits of the hash word based on the results of said comparisons</u>" as required by Claim 2, and as substantially required by Claim 12.

Based on the foregoing, the Applicants respectfully submit that independent Claims 1 and 12 are patentable over Schneider and notice to this effect is earnestly solicited. Claims 2-11 depend from Claim 2 and accordingly are allowable for at least this reason as well as for the separately patentable elements contained in each of said claims. Accordingly, separate consideration and allowance of each of the dependent claims is respectfully requested.

Schneider shows <u>directly comparing decrypted stored signatures from a database to signatures of a questionable image</u> (see, Schneider, page 228, Col. 2, lines 2-8, and Figure 3).

Similarly, Boles shows a system of creating digital signatures for known content, storing the digital signatures in a database,

and <u>comparing signatures from unknown content in pairs of 2</u>

<u>consecutive signatures directly to the signatures stored in the</u>

<u>database</u> to identify the unknown content (e.g., see, Boles,

abstract, FIG. 16, and Col. 12, line 34 though Col. 13, line 39).

Boles compares all the bits from the signatures from the unknown

content to all the bits from the signatures stored in the database

(e.g., see, Boles, FIGs. 15 and 19, and Col. 14, line 50 through

Col. 15, line 35).

The method of Claim 14 is not anticipated or made obvious by

the teachings of Schneider in view of Boles. For example,

Schneider in view of Boles does disclose or suggest, a method that

amongst other patentable elements, comprises (illustrative emphasis

provided) "(b) <u>searching said hash word in a lookup table</u>

<u>comprising potential hash words and a linked list of addresses</u>

<u>pointing to the database containing stored blocks of hash words to</u>

<u>find hash words stored in the database that correspond to said hash</u>

<u>word</u>; (c) calculating a difference between the input block of hash

words and a stored block of hash words in which the hash word found

in step (b) has the same position as the selected hash word in the

input block; (d) repeating steps (a) to (c) for a further selected

hash word until said difference is lower than a predetermined threshold; and (e) returning an identification of the respective information signal that corresponds to the stored block of hash words if step (d) is concluded" as required by Claim 14.

The method of Claims 18 and 19 are not anticipated or made obvious by the teachings of Schneider in view of Boles. For example, Schneider in view of Boles does disclose or suggest, a method that amongst other patentable elements, comprises (illustrative emphasis provided) "searching in the database the stored hash values for which holds that the reliable bits of the applied hash value match the corresponding bits of the stored hash value while ignoring unreliable bits of the applied hash value and corresponding bits of the stored hash value; (c) for each stored hash value found in step (b), calculating the bit error rate between the reliable bits of the hash value representing the unidentified information signal and the corresponding bits of the stored hash value; (d) determining for which stored hash values the bit error rate is minimal; and (e) returning an identification of the respective one of the plurality of information signals that corresponds to the minimal bit error rate" as required by Claim 18,

and as substantially required by Claim 19.

Based on the foregoing, the Applicants respectfully submit that independent Claims 14, 18, and 19 are patentable over Schneider in view of Boles and notice to this effect is earnestly solicited. Claims 15-17, 20, and 21-25 respectively depend from one of Claims 14 and 18 and accordingly are allowable for at least this reason as well as for the separately patentable elements contained in each of said claims. Accordingly, separate consideration and allowance of each of the dependent claims is respectfully requested.

In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicants reserve the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.
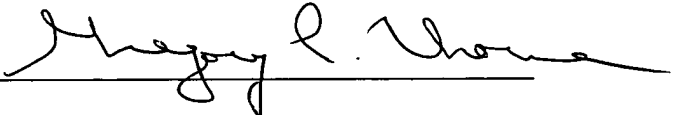
It is believed that no additional fees or charges are currently due for entrance of the accompanying amendment other than

those paid by the attached credit card authorization for one month extension of time. However, in the event that any additional fees or charges are required for entrance of the accompanying amendment, they may be charged to Applicants' representatives Deposit Account No. 50-3649. In addition, please credit any overpayments related to any fees paid in connection with the accompanying amendment to Deposit Account No. 50-3649.

Applicants have made a diligent and sincere effort to place this application in condition for immediate allowance and notice to this effect is earnestly solicited.

Respectfully submitted,

By _____

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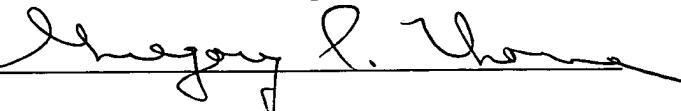Attorney for Applicant(s)
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